

## Hospital Self Audit Risk Assessment

**Nursing Units Audit:** Mark the response that most closely represents the way that nursing personnel discard the following items.

1. Where are the contents of partially used or unused syringes discarded?

- ☐ O. Hazardous waste if regulated and non-hazardous pharmaceutical waste if not, both incinerated
- ☐ A. Hazardous waste if regulated and red container/trash/sewer if not
- ☐ B. No segregation, all to needlebox/red sharps/sewer

2. Where are the contents of partially used or unused IV bags discarded?

- ☐ O. Hazardous waste if regulated and non-hazardous pharmaceutical waste if not, both incinerated
- ☐ A. Hazardous waste if regulated and red container/trash/sewer if not
- ☐ B. No segregation, all to needlebox/red sharps/sewer

**A. and B. Action Item (Questions 1 and 2)** Evaluate and dispose of hazardous waste in a black Covidien Kendall Hazardous Waste container. (RCRA) Consider segregating non-hazardous Rx into the white/blue Covidien Kendall pharmaceutical waste container for disposal by non-hazardous incineration to avoid introducing drugs into the sewer system or landfill. (Best Management Practice) Alternatively, manage all unused drug items as hazardous waste.

## Nursing Units Audit:

3. Where are empty drug vials or ampules discarded?

- ☐ O. In red sharps/needlebox
- ☐ A. In municipal trash
- ☐ B. Recycled

**A. Action Item:** Ensure safety of environmental services personnel regarding exposure to sharps and the security of containers with respect to drug diversion.

**B. Priority Action Item:** Since drug residue may be present, do not encourage recycling of empty drug vials. The opportunity for diversion of the vials and refilling with water for illegal re-sale also increases.

4. Where are the contents of partial drug vials or ampules discarded?

- ☐ O. Hazardous waste if regulated and non-hazardous pharmaceutical waste if not, both incinerated
- ☐ A. Hazardous waste if regulated and red container/trash/sewer if not
- ☐ B. No segregation, all to needlebox/red sharps/sewer

**A. and B. Action Item:** Evaluate and dispose of hazardous waste in a black Covidien Kendall Hazardous Waste container. (RCRA) Consider segregating non-hazardous Rx into the white/blue Covidien Kendall pharmaceutical waste container for disposal by non-hazardous incineration to avoid introducing drugs into the sewer system or landfill. (Best Management Practice) Alternatively, manage all unused drug items as hazardous waste.

## Nursing Units Audit:

5. Where is warfarin disposed?

- ☐ O. Hazardous waste container
- ☐ B. Red sharps/needlebox, sewer or municipal trash.

**B. Priority Action Item: Warfarin in all tablet sizes and dosage forms is EPA 'P-listed' waste. Discard unusable warfarin as Hazardous Waste.**

6. Where are expired insulin vials disposed?

- ☐ O. Hazardous waste container
- ☐ A. Returned to pharmacy
- ☐ B. Red sharps/needlebox, sewer or municipal trash.

**A. and B. Action Item: Human insulin contains m-cresol as a preservative in a concentration that fails the TCLP test, and therefore should be discarded as Hazardous Waste. This would include insulin returned to the pharmacy. IV insulin infusions are diluted enough to fall out of regulation as hazardous waste, but should be managed as non-hazardous waste.**

7. Where are used nicotine patches disposed?

- ☐ O. Hazardous waste container
- ☐ A. In red sharps/needlebox or municipal trash or sewer

**A. Action Item: Nicotine is a P listed waste, however, having been used, the patches do not meet the definition of a listed hazardous waste. Because 80% to 85% of the drug may still be in the patch, consider managing the used patch as a hazardous waste. (Best Management Practice)**

## Nursing Units Audit:

8. Where do you discard unused controlled substances?

- ☐ O. In sewer with double witness of destruction
- ☐ A. In red sharps/needlebox

**Note:** Due to the requirement of the Drug Enforcement Administration (DEA) that drugs be rendered non-recoverable by two healthcare professionals, drain disposal may still be the most viable option, with the written permission of the local publicly owned treatment works (POTW). The red sharps container should be used very sparingly to avoid diversion potential. (Best Management Practices), (Drug Enforcement Administration (DEA))

### Concerning Chemotherapy Management:

9. How are used, empty chemotherapy bags and sets disposed?

- ☐ O. Yellow or white trace chemotherapy container
- ☐ B. Red sharps container or municipal trash.

10. Where are chemotherapy gowns, gloves, and goggles disposed?

- ☐ O. Yellow or white trace chemotherapy container
- ☐ B. Red sharps container or municipal trash.

**B. Priority Action Item (Questions 9 and 10.):** Replace all red sharps containers or red bags with yellow or white trace chemotherapy containers to alert environmental services of the hazard. Yellow or white trace chemotherapy bags may be used for soft items. Dispose of by incineration as regulated medical waste.

## Nursing Units Audit:

11. Where are partially used chemotherapy IVs disposed?

- ☐ O. In a container labeled "Hazardous Waste –Toxic"
- ☐ A. In a yellow, white or other container for trace chemotherapy
- ☐ B. In a red sharps container or sewer.

**A. and B. Action Item: Provide a black Covidien Kendall Hazardous Waste container for chemotherapy bags that are not "RCRA empty." Place unused IV solutions and tubing in a ziplock bag before placing in hazardous waste container to prevent leaking. (RCRA, NIOSH Hazardous Drug Alert)**

12. Where are the materials used to clean up a chemotherapy spill disposed?

- ☐ O. In a container labeled Hazardous Waste
- ☐ B. In a yellow, white or other container for trace chemotherapy
- ☐ B. In a red container or regular trash.

**B. Priority Action Item: Train all employees to dispose of chemo spill clean-up materials in the Hazardous Waste container. (EPA) (RCRA)**